

REMARKS

Claims 1-30 are pending in the current application. In an Office Action dated August 2, 2007, the Examiner rejected claims 1,2, 4-24, 26-30 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent 6,298,324 (“Zuberec”); and rejected claims 3 and 25 under 35 U.S.C. §103(a) as being unpatentable over Zuberec in view of U.S. Patent 5,867,817 (“Catallo”). Applicant’s representative respectfully traverses these rejections.

*Response to Rejections under 35 U.S.C. §102(b)*

According to M.P.E.P. 2131, in order for a single prior art reference to anticipate a claim under 35 U.S.C. §102(b), the claim must teach each and every element as set forth in the claim, and the identical invention must be shown in as complete detail as is contained in the claim.

First, Zuberec is not directed to the same invention. Zuberec describes a system and method to provide help information by listing all available options in response to a help command from a user. Any time the user does not know or has forgotten available options from which to select, the user may speak a help command, such as: “What can I say?” Subsequently, *all* available options are repeated to the user, including those options that the user already knows. Thus, the help information system and method described in Zuberec produces slow processing, and the needs of the user are not optimized. By contrast, embodiments of the present invention include a help function which interfaces with a user to offer expeditious assistance to the user by *bypassing the enunciation of all options* available to the user, including those options which the user already knows. The user of the present invention is allowed to ask about a particular option; hence, help on all of the available options of a particular conversation position does not have to be listed or enunciated. Thus, if a user says “Help” or “What can I say?” or any other “hot” key words which invokes a help or assistance function, embodiments of the present invention detects the spoken utterance or “hot” key word, obtains a list of certain utterances from a vocabulary, and with the assistance of a converter, *instead of verbally enunciating all* of the obtained utterances for the user to hear, embodiments of

the present invention bypass the enunciation and go directly to the particular option or selection that the user does not understand, and provides help messages accordingly. Thus, embodiments of the present invention provide help messages that are directed to the particular option or selection that user does not understand without the user having to hear and waste time laboriously listening to an entire list of options.

Second, the Examiner contends that the claim element “retrieving an identified path from a set of paths” of claims 1, 6, and 23 is anticipated by col. 9, lines 32-35 of Zuberec. However, Applicant’s representative cannot find reference to language that is even remotely analogous to an “identified path” or “a set of paths” in col. 9, lines 32-35. In fact, col. 9, lines 32-35 are referring to steps of a control-flow diagram shown in Figure 7 of Zuberec, none of which suggests retrieving an identified path from a set of paths. In particular, step 202 of Figure 7 is directed to *detecting* an utterance not to *retrieving* an identified path. For a description, and an example, of what is meant by identified paths and a set of paths as relates to claims 1 and 6, Applicant’s representative would like to direct the Examiner’s attention to a passage of the detailed description of the current application that begins with the first full paragraph on page 10 and ends with the last full paragraph on page 11, and another passage that begins at the top of page 18 and ends on page 19. The Examiner contends that the claim element “retrieving an identified option from a set of options associated with the identified path” is anticipated in col. 9, lines 57-64. Applicant’s representative cannot find reference to *retrieving* an identified option in col. 9, lines 57-64. Rather, col. 9, lines 57-64 are directed to describing the operation carried out by a decision box (step 204) of the control-flow diagram show in Figure 7 of Zuberec. In other words, the utterance is already in hand and the description provided in col. 9, lines 57-64 relates to a decision to be made in step 204 based on that utterance. Finally, the Examiner contends that the claim element “concatenating the identified path and the identified option to form a selection path” is anticipated by col. 9, lines 64-67. Applicant’s representative cannot find reference to *concatenating* the identified path and the identified option. Col. 9, lines 64-67 are directed to examples of possible utterances that lead to separate subsequent paths and have nothing to do with the process of concatenation. Applicant’s representative would

like to direct the Examiner's attention to a description of concatenation in the detailed description of the current application in the paragraph beginning at the bottom of page 11 and ending at the top of page 12. In addition, there is no mention in col. 9, lines 57-64 of a selection path or an equivalent of a selection path.

Third, the Examiner contends that currently amended claims 7 and 14 are anticipated by a speech recognition system 40, shown in Figure 3 of Zuberec, and that elements of currently amended claims 7 and 14 correspond to elements of the speech recognition system 40. The Examiner also contends that the element "an assistance manager for forming a selection path and for finding a message associated with the selection path" of currently amended claims 7 and 14 is anticipated by the entire speech recognition system 40 shown in Figure 3. However, the assistance manager cannot be anticipated by the entire speech recognition system 40 and anticipated by elements of the speech recognition system 40. The assistance manager is one of several elements of a speech recognition system disclosed in currently amended claims 7 and 14 and does not perform or include elements of currently amended claims 7 and 14. In addition, Applicant's representative cannot find mention of an assistance manager or a device that performs the same operations as the assistance manager described in claims 7 and 14. In particular, Applicant's representative cannot find a device that is part of the speech recognition system 40 similar to that taught by Zuberec and forms a selection path and finds a message associated with the selection path, because Zuberec is directed to finding and uttering all messages associated with the equivalent of a selection path.

Finally, the Examiner contends that col. 9, lines 60-67 anticipate the original claim element "creating a selection path." In particular, col. 9, lines 60-67 teaches creating *all* available paths that can be expanded from a keyword utterance by the user. By contrast, currently amended claim 18 selectively creates a selection path without describing to the user all available paths.

Therefore claims 1, 6, 7, 14, 18, and 23 are not anticipated by Zuberec. Claims depending from claims 1, 6, 7, 14, 18, and 23 are also not anticipated by Zuberec due to depending from allowable base claims and further in view of the additional limitations recited in the dependent claims.

***Response to Rejections under 35 U.S.C. §103(a)***

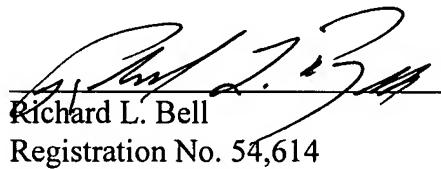
Applicant's representative asserts that claims 3 and 25 are patentable under 35 U.S.C. §103(a) over Zuberec in view of Catallo, because the Examiner has not established *prima facie* obviousness. “[I]n order [to] establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art.” See M.P.E.P. §2143.03.

The Examiner contends that Zuberec teaches the processor-based methods of claims 1 and 23 and that Catallo teaches the limitations of claims 3 and 25 in col. 2, line 29-31. First, Zuberec does not teach or suggest all of the elements of the base claims 1 and 23 of claims 3 and 25, respectively, as described above. Second, Applicant's representative contends that Catallo also does not teach or suggest the limitations of claims 3 and 25. First, Applicant's representative suggest that col. 2, lines 29-31 be read in context with the whole of the first paragraph of the summary of which it is a part, the abstract, and col. 6, lines 55-67 through col. 7, lines 1-24, which provide a more detailed description of the corresponding portion of the summary (col. 9, lines 29-31) sited by the Examiner. Catallo teaches the use of a speech recognition manager that receives representations of one or more words from a speech decoding system. The speech recognition manager interacts with a context interpretation manager which determines the *context* of the one or more words uttered by the user. The context interpretation manager of Catallo was developed to handle situation where people utter the same word or words in different circumstances because the words may have completely different meanings and illicite different responses from a listener. Catallo teaches using the speech recognition manager in combination with the context interpretation manager to handle normal human-to-human communication and thereby recognize spoken utterances so as to assign the correct contextual meaning to those utterances. By contrast, as stated above, embodiments of the present invention are directed to help functions which interface with a user to offer expeditious assistance to the user by bypassing the enunciation of all available options available to the user and are not directed to determining the context of words uttered by a user. Second, col. 2, lines 29-31 do not teach or suggest the

limitations of claims 3 and 25 as asserted by the Examiner. Catallo does not teach or suggest the limitation of claims 3 and 25 stating that the "identified path" referred to in the base claims 1 and 23 "is retrieved without having to describe to the user any paths from the set of paths other than the identified path." In addition, Catallo does not teach or suggest identified paths or the equivalent of identified paths in accordance with the present invention.

In Applicant's representative's opinion, all of the claims remaining in the current application are clearly allowable. Favorable consideration and a Notice of Allowance are earnestly solicited.

Respectfully submitted,  
Sherif Yacoub  
Olympic Patent Works PLLC



Richard L. Bell

Registration No. 54,614

Enclosures:

Postcards (2)  
Transmittal in duplicate

Olympic Patent Works PLLC  
P.O. Box 4277  
Seattle, WA 98194-0277  
206.621.1933 telephone  
206.621.5302 fax